

CJB

DEC 19 2012

CHARLES R. DIARD, JR.
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION
CLERK

UNITED STATES OF AMERICA

v.

MOHAMMAD ABDUL
RAHMAN ABUKHDAIR, and
RANDY LAMAR WILSON, JR.
a.k.a. RASHEED WILSON

* CRIMINAL NO. 12-00293-KD

*

* USAO NO. 10R00416

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* VIOLATIONS:

* 18 U.S.C. § 2339A

* 18 U.S.C. § 1542

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INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
18 U.S.C. § 2339A

Beginning on a date unknown to the grand jury, but no later than September 2011, through on or about December 11, 2012, in the Southern District of Alabama, Southern Division, and elsewhere, the defendants

MOHAMMAD ABDUL RAHMAN ABUKHDAIR, and
RANDY LAMAR WILSON, JR., *a.k.a.*, RASHEED WILSON

did willfully, knowingly, and unlawfully combine, conspire, confederate, and agree with each other and other persons, both known and unknown to the grand jury, to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including property, services, and personnel, including themselves, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 956(a) (conspiracy to kill, maim, or injure persons or damage property in a foreign country).

All in violation of Title 18, United States Code, Section 2339A.

COUNT TWO
18 U.S.C. § 1542

On or about January 31, 2012, in the Southern District of Alabama, Southern Division, the defendant

MOHAMMAD ABDUL RAHMAN ABUKHDAIR

knowingly and willfully made a false statement in an application for a United States passport with intent to induce and secure the issuance of a United States passport for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws. This offense was committed to facilitate an act of international terrorism, as defined in Title 18, United States Code, Section 2331.

In violation of Title 18, United States Code, Section 1542.

A TRUE BILL

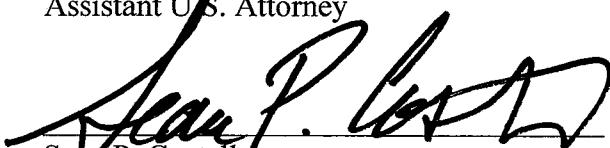
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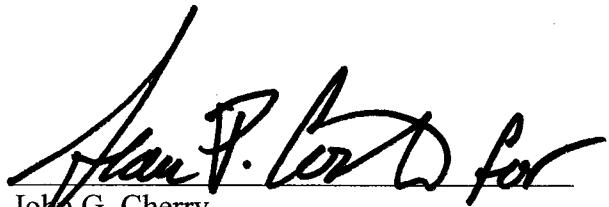
FOREMAN, UNITED STATES GRAND JURY
SOUTHERN DISTRICT OF ALABAMA

KENYEN R. BROWN
UNITED STATES ATTORNEY

by:


Christopher J. Bodnar
Assistant U.S. Attorney


Sean P. Costello
Assistant U.S. Attorney



John G. Cherry
Assistant U.S. Attorney
Chief, Criminal Division

DECEMBER 2012